

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

JEFFERY TODD GOULD (AIS# 140977), *

*

Plaintiff,

*

v.

2:05-CV-1102-F

*

AARON BEE, ET AL.,

*

Defendants.

*

**DEFENDANTS' MOTION TO EXTEND TIME TO FILE
SPECIAL REPORT AND ANSWER**

COME NOW Defendants Prison Health Services, Inc. (hereinafter "PHS"), Aaron Bee, R.N., H.S.A. and Donald McArthur, M.D. and respectfully request that this Honorable Court extend the time period which these Defendants have to file their Answer and Special Report in this action by fifteen days (15) up to and including March 2, 2006. As grounds for this Motion, Defendants show to the Court as follows:

1. Due to unforeseen medical circumstances, Defendants' counsel's wife is being induced for delivery on February 9, 2006 and, therefore, counsel will need a brief extension of time in which to comply with this Honorable Court's January 6, 2006 Order.
2. This brief extension of time will in no way prejudice any party, nor will it in any way delay the adjudication of this matter.

WHEREFORE, these Defendants request that this Honorable Court extend the time in which they have to respond to this Honorable Court's Order of January 6, 2006 fifteen (15) days up to and including March 2, 2006.

Respectfully submitted,

s/L. Peyton Chapman, III
Alabama State Bar Number CHA060
s/R. Brett Garrett GAR085
Attorneys for Defendants PHS, Aaron Bee,
R.N., H.S.A. and Donald McArthur, M.D.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served by U.S. Mail
this the 7 day of February, 2006, to:

Jeffery Todd Gould (AIS #140977)
Staton Correctional Facility
Post Office Box 56
Elmore, Alabama 36025

s/R. Brett Garrett GAR085
Attorneys for Defendants PHS, Aaron Bee,
R.N., H.S.A. and Donald McArthur, M.D.